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6 Attorneys for Plaintiff

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF ARIZONA

9 United States of America,
10
11 Plaintiff,

12 vs.

13 Daniel Blas-Torrealba,
14 Defendant.

4:20-CR-00507-SHR (MSA)

MOTION FOR PRODUCTION OF
MATERIAL CONTAINED IN UNITED
STATES PROBATION/ PRETRIAL
SERVICES' OFFICE FILE

15 The United States of America, by and through its undersigned attorneys,
16 respectfully moves this Court to issue an order requiring U.S. Probation/Pretrial Services
17 Office to release materials related to allegations contained in the pending Petition to
18 Revoke Petition dated October 5, 2021 (Doc. 43), which is set for hearing on November 6,
19 2023. The government cannot prosecute the supervised release violation petition without
20 these documents.¹

21 The government request that materials contained in the U.S. Probation/Pretrial
22 Service file regarding the (1) the "chronos" prepared by the probation officer/pretrial
23 services officer in relation to the allegations from October 7, 2020 to October 5, 2021 and
24 (2) all other reports, correspondence, or material regarding the subject matter of the Petition
25 that are in the probation officer's file, including police reports.
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28 ¹ The documents are needed to prepare for an admit/deny hearing, for any potential final disposition hearing, and to ensure that the government can meet its various disclosure obligations.

1 The government has conferred with the assigned probation/pretrial services officer
2 concerning the production of these documents. Undersigned counsel was advised by the
3 assigned officer that the U.S. Probation/Pretrial Services Office will not provide the
4 requested materials absent Court approval.

5 Respectfully submitted this 20th day of October, 2023.

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7 GARY M. RESTAINO
8 United States Attorney
9 District of Arizona

10 *s/Tanya Miller*

11 Tanya Miller
12 Assistant U.S. Attorney

13 Copy of the foregoing served
14 electronically or by other means
15 this 20th day of October, 2023, to:

16 United States Probation Department, Officer Jennifer De Alba
17 Kristian H. Salter, Esq.
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